

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UGOCHUKWU GOODLUCK
NWAUZOR, FERNANDO AGUIRRE-
URBINA, individually and on behalf of all
those similarly situated,

Plaintiffs,

v.

THE GEO GROUP, INC., a Florida
corporation,

Defendant.

No. 17-cv-05769-RJB

DECLARATION OF
UGOCHUKWU GOODLUCK
NWAUZOR IN SUPPORT OF
PLAINTIFFS' MOTION FOR
CLASS CERTIFICATION

I, UGOCHUKWU GOODLUCK NWAUZOR, declare as follows:

1. I am over the age of eighteen, competent to testify in this matter, and do so
based on personal knowledge.

2. I am a citizen of Nigeria, but was granted asylum by the United States on
January 24, 2017.

3. I was detained at the Northwest Detention Center ("NWDC") as a civil
immigration detainee from approximately June 2016 until January 2017 while my asylum
application was pending. I am currently authorized to work in the United States, and my

1 application for a Green Card is pending. I am currently employed as a housekeeper for a
2 large hotel chain.

3 4. After arriving at the NWDC, I learned about the dollar-a-day work program.
4 After learning about the program, I signed up requesting work through the program.

5 5. I had to wait to receive a work assignment until there was an opening. I
6 received my work assignment and schedule after the detainee who had been doing the job
7 left. My assignment was to clean the common showers in my pod in the afternoon after
8 "count time." It usually took me about an hour to perform my job each day. I continued
9 working in the dollar-a-day program until my release. I worked virtually every day of my
10 detention after receiving my assignment.

11 6. GEO supervised and controlled all aspects of my work, providing me with
12 training and the equipment I needed to perform my job at NWDC. Because of my detainee
13 status, GEO did not permit me to seek employment from another employer outside the walls
14 of the NWDC. Regardless of how many hours I worked in a day or week, I was never
15 compensated more than \$1 per day for my labor.

16 7. I used the money I earned in the VWP to make phone calls to my family back
17 in Nigeria and to purchase more and better food and personal hygiene items. The phone calls
18 were especially important, because I had to ask my brother to send me documents to help
19 with my asylum application.

20 8. To the best of my knowledge, many detainees took part in the work program
21 while I was at NWDC. Some detainees performed similar work assignments to mine, while
22 others worked in the kitchen, the laundry, the barbershop, and other cleaning and
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1 maintenance type jobs. I am not aware of any other detainee receiving more than \$1 per day
2 for participating in the work program.

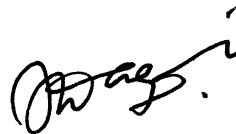
3 9. I understand that I am bringing this case on behalf of all current and former
4 detainees at NWDC who participated in the work program at any time since
5 September 26, 2014, and that I will be representing their interests in this case. When I heard a
6 news story about the lawsuit on the radio, I wanted to get involved. I understand that my role
7 in this case is to help the lawyers get proper payment for wages for all the other detainees
8 participating in the work program at NWDC since September 26, 2014, not just myself.

10 10. I understand the responsibilities involved in being both a plaintiff and a class
11 representative in this lawsuit. I am prepared to cooperate with my lawyers and meet all of my
12 duties and obligations to make sure this lawsuit is pursued in the best interest of me and all
13 other current and former participants in the work program at NWDC. For example, I have
14 been deposed by GEO's lawyers, and I understand that I may be required to respond to other
15 discovery.

17 11. I am willing to help prepare for and attend trial, to testify, and assist my
18 attorneys as needed and to continue to participate actively in the direction of this case.

19 I declare under penalty of perjury under the laws of the United States that the
20 foregoing is true and correct and based on my personal knowledge.

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22 Executed in Seattle, Washington, on June 21, 2018.

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25 Ugochuk Goodluck Nwauzor
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